

)	
Nelson L. Bruce,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:22-cv-02211-BHH-MGB
)	
Pentagon Federal Credit Union a/k/a)	
Pentagon Federal Credit Union Foundation)	
(“Collectively” PENFED); Experian)	
Information Solutions, Inc.; Trans Union,)	
LLC; Equifax Information Services, LLC;)	
ALL UNKNOWN DOE’S 1-100, et al.,)	
)	
Defendants.)	
)	

Pursuant to Rule 6, F.R.C.P. and Rule 6.01 of the Local Civil Rules for the United States District Court for the District of South Carolina, Defendant Pentagon Federal Credit Union (“PenFed”) respectfully requests that the Court extend the deadline for Penfed to file a Reply to Plaintiff’s Response in Opposition to the Motion to Dismiss [ECF No. 52]. In support of this Motion, PenFed respectfully shows the Court the following:

3. PenFed respectfully requests that the Court extend the deadline for it to file its Reply by nine (9) days, which would establish a new deadline of January 6, 2023.

4. The deadline for PenFed to file a Reply to Plaintiff's Response in Opposition to Dismiss has not previously been extended.

5. The requested extension would not affect any other deadlines as there has been no scheduling order entered for this matter.

6. PenFed makes this request in good faith.

WHEREFORE, PenFed respectfully requests that the Court extend the deadline for PenFed to file its Reply to Plaintiff's Response in Opposition to Dismiss until January 6, 2023.

Respectfully submitted,

WILLSON JONES CARTER & BAXLEY, P.A.

s/ G. Troy Thames

G. Troy Thames (Federal ID No.: 07713)

4922 O'Hear Avenue, Suite 301

North Charleston, SC 29405

Telephone: (843) 284-0832

Facsimile: (843) 606-3300

Email: tthames@wjcblaw.com

Michael A. Graziano (*pro hac vice* pending)

ECKERT SEAMANS CHERIN & MELLOTT, LLC

1717 Pennsylvania Avenue, N.W., Suite 1200

Washington, D.C. 20006

Telephone: 202.659.6671

Facsimile: 202.659.6699

E-mail: mgraziano@eckertseamans.com

North Charleston, South Carolina
December 22, 2022

**ATTORNEYS FOR DEFENDANT
PENTAGON FEDERAL CREDIT UNION**